

Exhibit B

From: [David B. Rankin](#)
To: [Weiss, Dara \(Law\)](#); [Lax, Joshua \(Law\)](#); [Robinson, Amy \(LAW\)](#); rkaufman@law.nyc.gov; adisenso@law.nyc.gov
Cc: [Payne Litigation Team](#); [AG-NYPDLitigation](#); [Wood](#); [Andrew B. Stoll](#); [Sierra Team](#)
Subject: Outstanding M + Cs + Correct the record
Date: Monday, October 25, 2021 4:51:32 PM

Hi all,

We saw the motion to withdraw filed late on Friday. We are concerned the motion suggests that Ms. Jacobs has not been significantly involved in the case since September 20th.

That's not true. Ms. Jacobs was the only attorney working on the case the week of September 29th (the week that Ms. Weiss was sick) – and the only attorney at many of our meet and confers in recent weeks, specifically including a meet and confer regarding the 2015 amendments, as well as the more historical documents following the decision on the motion to dismiss, among others. We understand how you staff the case is your business, but we are concerned that significant amounts of institutional knowledge will be lost causing further delay. This brings us into our larger concern that meet and confer requests are getting ignored by Defendants, and we have many requests that have not been responded to.

Some of these outstanding requests for meet and confers include (dates of request):

- Court-ordered meet and confer over documents – (10/20, 10/25)
- Identification of 30(b)(6) witnesses and second 30(b)(6) notice (10/20, 10/18)
- BWC/ Argus meet and confer – (10/15 and 10/18)
- 2015 Amendments in the second consolidated responses, as well as the substance of those responses (9/20, 9/21, 9/26, 9/28, 9/30, 10/13, 10/15)
- Documents dating back further than Defendants' initial objections, based on the motion to dismiss (7/13, 7/29, 8/5, 9/30)
- Underlying disciplinary files of Sgt. Zinstein (10/12)
- Failure to timely supplement discovery responses concerning the identity of an officer involved Cameron Yates' incident, and seeking confirmation of a deposition date (10/22)

We ask that you (1) write to the Court to correct the statement about Ms. Jacobs' participation in this case and (2) get us dates on all outstanding meet and confer requests by the end of the day tomorrow.

Best,
David

David B. Rankin (he/him) | Partner
Beldock Levine & Hoffman LLP
99 Park Avenue, PH/26th Fl. | New York, NY 10016
Tel: (212) 277-5825 Cell: (917) 455-0609
DRankin@blhny.com | <http://www.blhny.com>

This message may contain privileged material. If you are not the intended recipient, please return it.